

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**In Re: LEE BROTHERS, LLC**

**CHAPTER 11  
NO: 15- 50003 KMS**

**DECLARATION OF PROPOSED COUNSEL FOR DEBTOR  
PURSUANT TO BANKRUPTCY RULE 2014**

1. My name is PATRICK A. SHEEHAN. I am over 21 years of age and am competent to make the Declaration pursuant to the requirements of Rule 2014 of the Federal Rules of Bankruptcy Procedure.

2. I have personal knowledge of all facts stated in this Declaration.

3. I am a member of the firm of Sheehan Law Firm, PLLC ("SLF"), a professional association, and I practice law at the firm's office at 429 Porter Avenue, Ocean Springs, Mississippi.

4. This Declaration is filed in connection with the Debtor's Application for Approval of Employment of Counsel, filed with the Court by the Debtor.

5. I am a member in good standing of the State Bar of Mississippi and duly admitted to practice in the United States District Courts for the Northern and Southern Districts of Mississippi, the United States Court of Appeals for the Fifth Circuit and the United States Supreme Court.

6. SLF received a retainer of \$4,983.00 from the Debtor, and Debtor advanced to the SLF Trust Account \$1,717.00 for the filing fee which was paid to the Court from the SLF Trust Account. SLF expects to be compensated in a usual and customary manner, and in accordance with the provisions of the Bankruptcy Code. The Debtor has further agreed to retain the undersigned and this firm at the hourly rate of \$300.00 per hour for attorneys and \$100.00 per hour for paralegals.

7. SLF has investigated to determine its past and present involvement, if any, with any party in interest appearing in this case. Based upon such investigations and to the best of its present knowledge and belief, S&J has no connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee.

8. The only connection that the undersigned or his firm has had with the Debtor has been related to the filing of the instant case.

9. While the undersigned and SLF have made a diligent effort to ascertain the identity of all interested parties, this case may involve a substantial number of creditors, equity interest holders and other interested parties, and it is possible that the undersigned and SLF have not yet identified all parties in interest and, therefore there is a possibility that there may be other contacts to the case. To the best of my knowledge and belief, however, the undersigned and SLF have not identified all significant parties in this matter with the results set forth above. To the extent that any additional information comes to light, the undersigned and SLF will review, disclose and resolve any conflict or adverse interest that may appear in an appropriate fashion.

10. I declare under penalty of perjury that the above and foregoing statements are true and correct to the best of my knowledge, information and belief.

THIS the 2<sup>nd</sup> day of January, 2015.

By: /s/ Patrick A. Sheehan  
Patrick A. Sheehan, Proposed Counsel for Debtor

Sheehan Law Firm, PLLC  
492 Porter Avenue  
Ocean Springs, MS 39564  
Ph.: 228-875-0572 / Fax: 228-875-0895  
MS Bar No.: 6747

**CERTIFICATE OF SERVICE**

I, the undersigned PATRICK A. SHEEHAN, hereby certify that on this day, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following: all ECF participants; and I hereby certify that I have mailed by U.S. Postal Service the documents to the following non-ECF participants: none.

This the 2<sup>nd</sup> day of January, 2015.

/s/ Patrick A. Sheehan  
PATRICK A. SHEEHAN